

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

MICHAEL J. BELLEAU,

Plaintiff,

v.

Case No. 12-CV-1198 (WCG)

EDWARD F. WALL, et. al.

Defendants.

DEFENDANTS' MOTION TO FILE DOCUMENTS UNDER SEAL

The defendants, pursuant to Civil Local Rule 79(d), move to file the following documents under seal in conjunction with their summary judgment submission:

- The Affidavit of Dr. Richard Elwood
- Exhibit 1005 (Chapter 980 Evaluation of Michael Belleau)
- Exhibit 1008 (Special Purpose Chapter 980 Evaluation of Belleau)
- Defendants' Proposed Finding of Fact
- Defendants' Brief in Support for Motion for Summary Judgment

Pursuant to the Stipulation and Protective Order signed on June 10, 2014, by the Court (Dkt. 45 ¶ 13), defendants' counsel believe that it is proper to file the Ch. 980 documents under seal because they contain confidential medical-related information about the plaintiff. The referenced medical documents contain confidential medical information obtained through the Authorization and Informed Consent for Use and Disclosure of Medical Information form signed by the plaintiff

June 4, 2014, which are covered under the Stipulation and Protective Order (Dkt. 45 ¶ 7).

Because the Affidavit of Elwood, the proposed findings, and the brief also reference some of the details in these medical records, the defendants are also requesting to file those documents under seal out of an abundance of causation. However, if the plaintiff wishes to affirmatively waive any confidentiality concerns related to the affidavit, proposed findings, or brief, the defendants have no objection to lifting the seal of those documents.

Dated this 16th day of February, 2015.

Respectfully submitted,

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